

**UNSWORN DECLARATION**  
**IN SUPPORT OF FORFEITURE COMPLAINT**

**INTRODUCTION**

I, Jose L Rosario, being first duly sworn, hereby depose and state as follows:

1. Your affiant is a Special Agent with the Federal Bureau of Investigation (FBI) assigned to the San Juan Field Office. As such, your affiant is an investigative or law enforcement officer of the United States within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrest for, offenses enumerated in Title 18, United States Code.
2. Your affiant has been a Special Agent with the FBI since March 2017. I am currently assigned to the San Juan (SJ) Field Office with the Safe Streets Task Force (SJSSTF). Our investigations are focused on street level gangs and criminal organizations operating within Puerto Rico. Offenses frequently encountered include narcotics distribution, firearms offenses, extortion, murder, etc. My duties include handling informants, cooperating defendants, intelligence analysis, surveillance and arrest operations, source payments, multi-agency case coordination/de-confliction/liaison, conducting interviews and interrogations. My collateral duty is as a member with the FBI Crisis Negotiator.
3. This Unsworn Declaration is submitted in support of a verified complaint of forfeiture, which involves the offenses detailed in 21 U.S.C. §§ 841(a)(1), 846

and 860; and 18 U.S.C. §§ 924(c) and 1956(a)(1)(B)(i) & (h), particularly all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished traceable to such violations, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter. Therefore, I have not set forth each and every fact learned during the course of this investigation.

#### **PROPERTY TO BE FORFEITED**

- one (1) fashion ring in 14k yellow gold
- one (1) Eternity ring with 138 brilliant diamonds
- one (1) Rolex Yacht-Master model number 16623
- one (1) 14k yellow gold bangle with 213 diamonds
- one (1) curb link chain with 747 brilliant diamonds and 14k yellow gold
- one (1) Rolex Day Date II Superlative Chronometer
- one (1) Eternity ring with 158 brilliant diamonds
- one (1) curb link chain with 1,645 brilliant diamonds
- one (1) saw film series pendants in 14k yellow gold

#### **BASIS FOR FACTS CONTAINED IN THIS UNSWORN DECLARATION**

4. The information in this affidavit is based upon my personal knowledge, as well as on information that I have received from witnesses and other law enforcement sources. Because this affidavit is made for the limited purpose of establishing probable cause for the complaint, I have not recited each and every

fact known to me as a result of the investigation. As a result of my participation in this investigation, conversations and reports made by other SAs, Police of Puerto Rico (POPR) Officers, FBI Task Force Officers (TFOs), witnesses and other concerned parties; I am familiar with the circumstances of the offenses described in this affidavit. On the basis of this familiarity, I allege that the facts show that:

5. In 2019, FBI San Juan Safe Streets Task Force initiated an investigating targeting the criminal activities of the Vista Hermosa Violent Gang (VHVG). According to the investigation, VHVG was responsible for operating drug distribution points in the San Juan, Puerto Rico metropolitan area including drug points in PHP Vista Hermosa. The aforementioned criminal activities were in violation of 21 U.S.C. §§ 841(a)(1)(b)(1)(A), 846 and 860; possession of controlled substances with intent to distribute and of 18 U.S.C. § 924(c) for possession of a firearm in furtherance of a drug trafficking crime. The VHVG was expanding its “turf” by violently overtaking public housing projects in the San Juan, Puerto Rico metropolitan area and by joining forces with leaders of other public housing projects in the San Juan, Puerto Rico area, including PHP Luis Llorens Torres.
6. On May 17, 2022, a Federal Grand Jury returned an Indictment on 41 defendants, including Hector Santiago-Medina and Keyshla Rodriguez-Acevedo. *See* Criminal Case No. 22-213 (ADC) ECF No. 3.
7. Santiago-Medina was indicted for violations to 21 U.S.C. §§ 841(a)(1), 846 and

860; and 18 U.S.C. §§ 924(c) and 1956(a)(1)(B)(i) & (h). Rodriguez-Acevedo was indicted for violations to 21 U.S.C. §§ 841(a)(1), 846 and 18 U.S.C. § 1956(a)(1)(B)(i) & (h). *See* Criminal Case No. 22-213 (ADC) ECF No. 3.

8. On October 12, 2023, Santiago-Medina plead guilty to violations to 21 U.S.C. §§ 841(a)(1)(D), 846 and 860, and 18 U.S.C. § 924(c)(1)(A). *See* Criminal Case No. 22-213 (ADC) ECF No. 899.
9. On November 8, 2023, Rodriguez-Acevedo plead guilty to violations to 21 U.S.C. §§ 841(a)(1)(D) and 846, and 18 U.S.C. § 1956(a)(1)(B)(i) & (h). *See* Criminal Case No. 22-213 (ADC) ECF No. 941.
10. In 2016, Santiago-Medina was charged with felon in possession of firearm and has a pattern of criminal violations related to drug trafficking. *See* Criminal Case No. 16-239 (ADC). At the moment of the intervention, he was under supervised release by the US Probation office until July 31, 2022. Santiago-Medina has also been charged for drugs in 2010, 2011 and weapon offense in 2012. *See* Criminal Case No. 12-479 (JAG).
11. He has a consensual relationship with Rodriguez-Acevedo.
12. Both Santiago-Medina and Rodriguez-Acevedo are beneficiaries of several governmental programs they requested based on their reported low income.
13. A review of Rodriguez-Acevedo's and Santiago-Medina's tax records with the Puerto Rico Department of Treasury revealed neither have ever filed tax returns nor have reported income payment in W-2 or for professional services. They do not have any registered business either.

14. On May 30, 2018, Rodriguez Acevedo obtained a vehicle loan from Villa Coop providing two paystubs and a W-2 Tax form indicating that she worked for the Sheraton Hotel. Sheraton Hotel confirmed to Agents that Rodriguez-Acevedo never worked for them and the paystubs and W-2 form were false. Puerto Rico Department of Treasury also certify that the W-2 Form was false.
15. On October 23, 2020, Rodriguez-Acevedo obtained a second vehicle loan from Villa Coop providing two paystubs and a W-2 Tax form indicating that she worked for Accounting & Business Solutions. Puerto Rico Department of Treasury also certify that they did not have any records of Accounting & Business Solutions and that the W-2 Form was false.
16. On January 27, 2022, FBI agents and POPR conducted surveillance at condominium "Brisas de Parque Escorial" in Carolina, Puerto Rico. Santiago-Medina was seen leaving building #39 wearing a fanny pack and carrying a backpack and drove away on a gray in color Toyota Highlander (vehicle #1). POPR observed vehicle #1 with overly tinted windows driving northeast PR-8 and conducted a traffic stop. A POPR trained K-9 to detect the presence of firearms alerted positive on vehicle #1 in the front passenger seat. Simultaneously, at building #39 of "Brisas de Parque Escorial", a female, later identified as Keyshla Michelle Rodriguez-Acevedo (Rodriguez-Acevedo), was seen leaving apartment #3901, from building #39 at "Brisas de Parque Escorial" followed by three minors. Rodriguez-Acevedo was observed with a large purple suitcase and several bags, which she placed inside a wine in color

Toyota Highlander trunk (targeted vehicle) (PR tag JAL 723, VIN#: 5TDZARFH4JS036911) and drove away. Later that day, POPR was patrolling the PR 3 in Carolina, PR, saw targeted vehicle with overly tinted windows, and conducted a traffic stop. A K-9 trained to detect the presence of firearms alerted positive on trunk of the targeted vehicle, which was later towed to an FBI parking space to execute search warrant.

17. The following items were seized from targeted vehicle:

- Inside a blue jewelry box:
  - Curb link chain (bracelet)
  - Rolex Day Date II Superlative Chronometer
  - Eternity ring
  - Curb link chain
  - Pendant of Saw Fil Series
- Inside a black purse:
  - Fashion ring in 14 karat
  - Eternity ring
  - Rolex Yacht-master model no. 16623
  - Bangle 14 karat (bracelet)

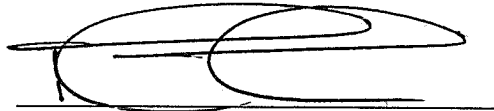
18. The Pendant of Saw Film Series is consistent with drug the brand attributed to Santiago-Medina, that is \$15.00 and \$5.00 baggies of cocaine and \$25.00 and \$10.00 baggies of marihuana.

19. On January 28, 2022, Agents returned the vehicles to Rodriguez-Acevedo and

provided a receipt for the jewelry seized. Rodriguez-Acevedo stated that someone would claim the jewelry, because it did not belong to her husband.

20. Based on the aforementioned facts, I believe that there exist sufficiently detailed facts to support a reasonable belief that the government will be able to meet its burden of proof at trial and should be forfeited under 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. 881(a)(6).

Sworn and signed under penalty of perjury, pursuant to 28 U.S.C. § 1746, in San Juan, Puerto Rico this 16<sup>th</sup> day of February, 2024.

A handwritten signature in black ink, consisting of a stylized 'J' followed by a large loop and a horizontal stroke.

Jose Rosario, Special Agent  
Federal Bureau of Investigation